

David H. Krieger, Esq.
NV Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 130
Henderson, Nevada 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
dkrieger@hainesandkrieger.com

Danny J. Horen, Esq.
NV Bar No. 13153
Kazerouni Law Group, APC
7854 W. Sahara Avenue
Las Vegas, NV 89117
Telephone: (800) 400-6808x7
Facsimile: (800) 520-5523
danny@kazlg.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CECILIA RAMOS,
Plaintiff,

v.

**CREDIT MANAGEMENT, LP.,
SYNCHRONY BANK, WELLS
FARGO FINANCIAL NEVADA,
INC., and EXPERIAN
INFORMATION SOLUTIONS,
INC.**

Defendants.

Case No.: 2:15-cv-00277-APG-GWF

**STIPULATION AND |
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT WELLS FARGO
FINANCIAL NEVADA, INC.'S
MOTION TO DISMISS**

[FIRST REQUEST]

Plaintiff, CECILIA RAMOS ("Plaintiff"), and Defendant, WELLS FARGO FINANCIAL NEVADA, INC. ("Wells Fargo"), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Wells Fargo's Motion to Dismiss. The current deadline is set for June 8, 2015.

1. Plaintiff's Complaint was filed on February 17, 2015. [Dkt. No. 1]
2. Wells Fargo filed its Motion to Dismiss [Dkt. No. 12] on May 22, 2015.
3. Plaintiff and Wells Fargo have agreed to an extension of time of 14 days, up to and including June 22, 2015 for Plaintiff to respond to Wells Fargo's Motion To Dismiss.
4. This request is not made for purposes of delay, but rather to allow Plaintiff the opportunity to fully brief its Opposition and the parties to explore settlement.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including June 22, 2015, for Plaintiff to respond to Wells Fargo's Motion to Dismiss.

DATED: June 8, 2015

SNELL & WILMER

/s/ Karl Riley
Karl Riley, Esq.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
matthew.knepper@akerman.com
Attorneys for Wells Fargo

KAZEROUNI LAW GROUP, APC

/s/ DANNY J. HOREN
DANNY J. HOREN, ESQ
7854 W. Sahara Avenue
Las Vegas, NV 89117
danny@kazlg.com
Attorneys for Plaintiff

SO ORDERED. Plaintiff shall have 14 days, up to and including June 22, to respond to Wells Fargo's Motion to Dismiss.

Dated: June 9, 2015.


UNITED STATES DISTRICT JUDGE

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: June 8, 2015

KAZEROUNI LAW GROUP

By: /s/ Danny Horen
DANNY HOREN, ESQ.
ATTORNEY FOR PLAINTIFF